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6 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

7 AJULENA BARNES,)
8)
Plaintiff,) Case No. 2:17-cv-00101-APG-PAL
9)
v.)
10)
BOCCI ENGINEERING, LLC, a)
11 Limited Liability Company;)
EMPLOYERS ONE SOURCE GROUP,)
12 INC., a foreign corporation;) FIRST JOINT STIPULATION AND
and DOES 1-50, inclusive,) ORDER TO EXTEND DISCOVERY AND
13 Defendants.) LIFT STAY
14)
_____)

15
16 Defendants Bocci Engineering, LLC and Employers One Source
17 Group, Inc. by and through their new counsel Law Office of Mary
18 F. Chapman, Ltd. and Plaintiff Ajulena Barnes by and through her
19 attorney of record Watkins & Letofsky, LLP hereby make their
20 First Request for an Extension of Time for Discovery pursuant to
21 LR 6-1 and LR 26-4, and also request the Court officially lift
22 the Stay currently in place.

23 The Parties hereby stipulate and request that this Court
24 grant their request to an extension of the discovery deadlines in
25 the above-captioned case for one hundred twenty (120) days.

26 In support of this Stipulation and Request, the parties
27 state as follows:

28 1. Plaintiff's Complaint was filed on January 11, 2017.
On April 17, 2017, Plaintiff filed certificates of service for

1 both Defendants.

2 2. Defendants filed a partial motion to dismiss on June
3 26, 2017. The Court granted the partial motion to dismiss on
4 August 8, 2017. On August 22, 2017, Defendants filed their
5 Answers.

6 3. On August 8, 2017, the Parties filed their Joint
7 Discovery Plan. The Court issued the scheduling order on August
8 11, 2017. A Joint Interim Status Report was filed on October 26,
9 2017.

10 4. The Parties filed Joint Stipulations to Stay
11 proceedings pending the completion of the ENE and these requests
12 were granted by the Court. (See, Docket Numbers 9-12, 15-16, and
13 25-26). The ENE conference was held on October 30, 2017, a
14 settlement was not reached. After completion of the ENE the stay
15 was inadvertently not lift by the clerk of court.

16 4. The parties have exchanged information as required by
17 Fed.R.Civ.P. 26(a)(1)., and have also supplemented their Initial
18 Disclosures.

19 5. On November 9, 2017, Plaintiff served Request for
20 Production of Documents and Interrogatories on both Defendants.
21 These responses are not yet due, but Plaintiff has agreed to an
22 extension of time for responses until January 11, 2018, based
23 upon the appearance of new counsel.

24 6. On November 28, 2017, Defendants filed a substitution
25 of counsel.

26 7. Based upon the Court approved Stays in this case the
27 Parties have actually only had from November 1, 2017 until the
28 scheduled cut off of December 26, 2017, a total of fifty-six (56)

days which includes two holidays. This is an inadequate time to complete discovery especially given the change of legal counsel. Accordingly, the extension requested by the Parties would allow the Parties the regular 180 day discovery period.

10. The following is a list of the current discovery deadlines and the parties' proposed extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	December 26, 2017	April 25, 2018
Dispositive Motions	August 5, 2015	November 4, 2015
Interim Status Report	Passed	February 23, 2018
Amend Pleadings or Add Parties	Passed	January 25, 2018
Expert Disclosures	Passed	February 23, 2018
Rebuttal Experts	Passed	March 26, 2018
Dispositive Motions	January 25, 2018	May 25, 2018
Pretrial Order	February 26, 2018	June 25, 2018
Extension of Discovery	December 5, 2017	April 4, 2018

11. This Stipulation shall extend all of the deadlines referenced above. No other deadlines shall be extended as a result of this Stipulation.

12. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery in this case.

13. This is the first request for extension of time for discovery in this matter.

1 WHEREFORE, the Parties respectfully request that this Court
2 extend the deadlines as referenced above.

3 WHEREFORE, the Parties respectfully request that this Court
4 officially lift the previously issued Stay.

5 Dated this 29th day of November, 2017.

6
7 Dated: November 29, 2017

Respectfully submitted,
Law Office of Mary F. Chapman, Ltd.

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9
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23
24 IT IS SO ORDERED.

25 
26 United States Magistrate Judge

27 Dated: December 1, 2017
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